

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

**LORI FITZGERALD, *et al.*,**

**Plaintiffs,**

**v.**

**Civil Action No. 3:20-cv-00044-NKM-JCH**

**JOSEPH WILDCAT SR., *et al.*,**

**Defendants.**

**MOTION TO SEAL EXHIBIT B OF DECLARATION OF GEOFFREY H. KOZEN IN  
SUPPORT OF MOTION TO DISMISS PLAINTIFF MAVILLE’S CLAIMS AND  
MOTION TO COMPEL ARBITRATION OF MAVILLE’S CLAIMS**

Pursuant to W.D. Va. Gen. R. 9, defendant Sky Trail Servicing Group, LLC (“Skytrail Servicing”) moves for an order to seal Exhibit B attached to the Declaration of Geoffrey H. Kozen in Support of Motion to Dismiss Plaintiff Maville’s Claims and Motion to Compel Arbitration of Maville’s Claims, filed contemporaneously with this motion. In support of this Motion, Skytrail Servicing states the following:

1. Exhibit B is a contract between Ningodwaaswi, LLC, d/b/a Sky Trail Cash (“Sky Trail Cash”) and Skytrail Servicing that contains information regarding the business structure of Sky Trail Cash and the relationship between Sky Trail Cash and Skytrail Servicing.

2. The vast majority of the information contained in Exhibit B is not otherwise publicly available, meant to be kept confidential by Sky Trail Cash and Skytrail Servicing, and would prejudice the competitive business interests of both entities if publicly disclosed.

3. Sealing Exhibit B provides the Court and the parties to this lawsuit with the means to consider its contents in the record while safeguarding the confidential nature of its contents from any party outside this litigation.

WHEREFORE, Skytrail Servicing Group, LLC respectfully requests that the Court enter an order granting its motion to seal and requests that Exhibit B remain sealed indefinitely.

**WILLIAM CHENEY PRUETT and  
SKY TRAIL SERVICING GROUP, LLC**

By: /s/David N. Anthony

David N. Anthony  
Virginia State Bar No. 31696  
*Counsel for William Cheney Pruett and Sky Trail  
Servicing Group, LLC*  
TROUTMAN PEPPER HAMILTON SANDERS LLP  
1001 Haxall Point  
Richmond, VA 23219  
Telephone: (804) 697-5410  
Facsimile: (804) 698-5118  
Email: david.anthony@troutman.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of December 2022, I caused the foregoing document to be filed with the Clerk of Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ David N. Anthony

David N. Anthony

Virginia State Bar No. 31696

*Counsel for William Cheney Pruett and Sky Trail  
Servicing Group, LLC*

TROUTMAN PEPPER HAMILTON SANDERS LLP

1001 Haxall Point

Richmond, VA 23219

Telephone: (804) 697-5410

Facsimile: (804) 698-5118

Email: david.anthony@troutman.com

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